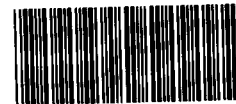


ORIGINAL
(Red)

BUREAU OF SOLID WASTE MANAGEMENT
407 South Cameron Street
Harrisburg, Pennsylvania 17101
(717) 787-9697
April 15, 1982

NOTICE OF VIOLATION



SDMS DocID

2210099

Certified Mail No. P15 5816949

Kopper's Company, Inc.

Box 312

Arch Street

York, PA 17405

Attn: Mr. Gerald Champess

Re: Facility Inspection
ID #PAD004382453
Property of Kopper's Company, Inc.
Arch Street
York City
York County

Gentlemen:

As a result of the inspection conducted on March 31, 1982 and in accordance with Departmental Hazardous Waste Regulations, the following violations were identified at the Kopper's Company, Incorporated, facility:

1. Inspection of the area used for temporary storage of flammable liquid wastes revealed the presence of an active electrical power line located directly above this area.

This is a violation of Chapter 75, Section 265(g)(1) and Act 97, Section 403(b)(9).

All barrels containing flammable liquid wastes should be relocated to another temporary storage area which is protected from sources of ignition. "No Smoking" signs should be posted wherever there is a potential hazard from ignitable wastes.

2. Inspection of barrels containing flammable liquid wastes in the main hazardous waste storage area revealed that no "flammable" warning labels had been placed on these barrels.

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This is a violation of Chapter 75, Section 262(f)(11) and Act 97, Section 403(b)(2). All barrels containing flammable liquid wastes should be labeled with flammable liquid warning labels according to U.S.D.O.T. specifications under 49 C.F.R. Part 172.

3. Review of the Preparedness, Prevention, and Contingency plan indicated the absence of safety and emergency equipment and the lack of a written inspection schedule for checking and testing such equipment.

This is a violation of Chapter 75, Sections 265(e)(2), (e)(3), (1), (7), and Act 97, Section 403(b)(9).

Kopper's Company should design a written inspection schedule for inspecting all safety and emergency equipment, security devices, and operating structural equipment which are important in preventing or responding to environmental hazards. In addition, the PPC Plan should contain an up-to-date list of emergency equipment which specifies the location, description, and capabilities of each item.

4. Review of the PPC Plan indicated a lack of arrangements for coordinating outside emergency response services.

This is a violation of Chapter 75, Section 265(1)(5) and Act 97, Section 403(b)(9).

The contingency plan should include arrangements for local and emergency response services (example: hospital, fire department) as well as agreements with qualified industrial waste cleanup contractors in the event of an emergency.

During the inspection, an excavated pit was noted adjacent to the Western Maryland Railroad and within the southeast property boundary of the Kopper's facility. A light brown solid residue and a gray color liquid was observed in the bottom of this open pit. Please forward to this office the following information concerning this specific condition:

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- A. Identification of the types and quantities of industrial residues and liquids contained within the pit.
- B. An exact schematic description of the industrial processes which result in the generation of the above mentioned residues and liquids. Please include the dimensions and the intended use or purpose of the pit.
- C. Representative analysis of both the liquid and solid residue phases in the pit to confirm their identities. A hazardous waste determination as specified by Chapter 75, Section 262(b) should also be included.
- D. Locations and descriptions of past industrial waste disposal activities within the last 3 years which may have occurred at the Kopper's facility in York, Pennsylvania.

Be advised that on-site disposal or improper storage of solid wastes may constitute violations of State law. Please forward this information to this office within thirty (30) days. This information will be reviewed and evaluated by the DER Region III technical staff. Please include a written statement or response indicating the corrective steps which have been taken, the results achieved and actions taken by Kopper's Company, Inc. to avoid additional violations.

Your cooperation is appreciated. Should any questions arise concerning inspection on March 31, 1982, we will be pleased to discuss them with you.

Respectfully,

Joseph A. Kozlosky
Solid Waste Specialist
Harrisburg Regional Office

JAK:wam

bcc: Frank Fair
Bob Benyin
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